

Petroleum HPV

201-14906

December 15, 2003

The Honorable Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

**Attention: Chemical Right-to-Know
HPV CONSORTIUM**

Re: Reclaimed Substances Test Plan and Robust Summary

Dear Administrator Leavitt:

The American Petroleum Institute, on behalf of the Petroleum HPV Testing Group, is pleased to submit the Reclaimed Substances test plan and robust summary. The Petroleum HPV Testing Group is a consortium representing 92 percent of the nation's petroleum refining capacity. The Group is made up of 70 companies of the American Petroleum Institute (API), the National Petrochemical and Refiners Association (NPRA), the Gas Producers Association (GPA) and the Asphalt Institute (AI). Our consortium has chosen not to use the HPV Tracker system for submission of our test plans due to the complexity of petroleum substances categories and the associated test plans. We are therefore submitting this test plan, as well as the robust summary, directly to EPA to make available for public comment.

Note that the Testing Group has previously submitted a test plan entitled "Reclaimed Petroleum Hydrocarbons" that contained five chemical substances that were included in the original list of about 17 reclaimed substances submitted to EPA under the HPV Program.

For purposes of evaluating the remaining substances, the attached test plan created four chemical categories. Because the majority of the substances in these categories were intermediate streams or spent acids and caustics, it was the decision of the Testing Group that only one of the four categories, streams containing naphthenic acids, be evaluated for health and environmental effects. For that reason, there is only one robust summary included with the test plan.

Electronic copies of the test plan (in .pdf format) and robust summary (in .pdf format) are accompanying this letter via email to the EPA HPV robust summary email address (<http://www.epa.gov/chemrtk/srbstsum.htm>). An electronic copy of the robust summary as a IUCLID file also will be submitted at a later date. This submission is also being sent, via email, to the individuals listed below, including Mr. Charles Auer.

Please feel free to contact me (202-682-8344; twerdokl@api.org) or Tom Gray (202-682-8480; grayt@api.org) with any comments or questions you may have regarding this submission.

Lorraine Twerdok, Ph.D., DABT
Administrator, Petroleum HPV Testing Program

Cc: C. Auer, USEPA
R. Hefter, USEPA
O. Hernandez, USEPA
Petroleum HPV Testing Group Oversight Committee and Technical Workgroup

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